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1	Ryan J. Works, Esq. (NSBN 9224) Amanda M. Perach, Esq. (NSBN 12399)
2	McDONALD CARANO LLP 2300 West Sahara Avenue, Suite 1200
3	Las Vegas, Nevada 89102 Telephone: (702) 873-4100
4	rworks@mcdonaldcarano.com aperach@mcdonaldcarano.com
5	and
6	
7	John R. Ashmead, Esq. Robert J. Gayda, Esq.
8	Catherine V. LoTempio, Esq. Andrew J. Matott, Esq.
	SEWARD & KISSEL LLP
9	One Battery Park Plaza New York, NY 10004
0	Telephone: (212) 574-1200 ashmead@sewkis.com
1	gayda@sewkis.com
2	lotempio@sewkis.com matott@sewkis.com

[Proposed] Counsel for Official Committee

of Unsecured Creditors

## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF NEVADA

Case No.: 23-10423-mkn
Chapter 11
_
NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE

PLEASE TAKE NOTICE that the attorneys listed below hereby appear as counsel to the OFFICIAL COMMITTEE OF UNSECURED CREDITORS ("<u>UCC</u>") appointed in the Chapter 11 Case of the above-captioned debtor (the "<u>Debtor</u>"). Under chapter 11 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") and pursuant to Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>") and Bankruptcy Code sections 342 and 1109(b), the UCC requests that copies of any and all notices, pleadings, motions, orders to

show cause, a	applications,	presentments,	petitions,	memoranda,	affidavits,	declarations,	orders,	0
other docume	nts, filed or	entered in these	e cases, be	transmitted to	o:			

Ryan J. Works, Esq. (9224) Amanda M. Perach, Esq. (NSBN 12399) McDONALD CARANO LLP 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 rworks@mcdonaldcarano.com aperach@mcdonaldcarano.com

and

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John R. Ashmead, Esq. Robert J. Gayda, Esq. Catherine V. LoTempio, Esq. Andrew J. Matott, Esq. SEWARD & KISSEL LLP One Battery Park Plaza New York, NY 10004 ashmead@sewkis.com gayda@sewkis.com lotempio@sewkis.com matott@sewkis.com

PLEASE TAKE FURTHER NOTICE that this request includes, without limitation, not only the notices and papers referred to in the provisions specified above, but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that (1) affects or seeks to affect in any way the rights or interests of the UCC or any other party in interest in these cases, including (a) the Debtor, (b) property of the Debtor or the Debtor's estate, or proceeds thereof, (c) claims against or interests in the Debtor, (d) other rights or interests of creditors of the Debtor or other parties in interest in this case, (e) property or proceeds thereof in the possession, custody, or control of the Debtor, or (2) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by the UCC or any other party in interest.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of the UCC (1) to have final orders in non-core matters entered only after de novo review by a higher court, (2) to trial by jury in any

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proceeding so triable in these cases or any case, controversy, or proceeding related to these cases
(3) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal
or (4) to any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in
law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments
are expressly reserved.

DATED this 24th day of February, 2023.

## McDONALD CARANO LLP

Ву	: /s/ Ryan J. Works
•	Ryan J. Works, Esq. (NSBN 9224)
	Amanda M. Perach, Esq. (NSBN 12399)
	2300 West Sahara Avenue, Suite 1200
	Las Vegas, Nevada 89102
	rworks@mcdonaldcarano.com
	aperach@mcdonaldcarano.com

and

SEWARD & KISSEL LLP John R. Ashmead, Esq. Robert J. Gayda, Esq. Catherine V. LoTempio, Esq. Andrew J. Matott, Esq. One Battery Park Plaza New York, NY 10004 ashmead@sewkis.com gayda@sewkis.com lotempio@sewkis.com matott@sewkis.com

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